

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JUAN CARLOS MASSA VELAZQUEZ

DEBTOR

CASE NO. 20-03763/MCF

CHAPTER 13

**DEBTOR'S REPLY TO MOTION TO DISMISS FOR FAILURE TO DELIVER
TAX REFUNDS, DOCKET NO. 25**

TO THE HONORABLE COURT:

NOW COMES, JUAN CARLOS MASSA VELAZQUEZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss for Failure to Deliver Tax Refunds*, Docket No. 25, stating that the Trustee had not received the Debtor's "tax refunds" for the years 2020 and 2021.

2. The Debtor hereby respectfully submits that on November 1, 2022, he provided to the Trustee (uploaded to the Trustee's system) his income tax returns pertaining to years 2020 and 2021.

3. The Debtor did receive the following tax refunds: 2020/\$1,073.00 and 2021/\$1,133.00, for a total of \$2,206.00 for tax refunds received during years 2020 and 2021.

4. The Debtor hereby respectfully submits that on January 3, 2023, the Debtor sent to the Trustee six (6) money orders, in a total amount of \$2,206.00, to cover all amounts received for tax refunds for the years 2020 and 2021. Attached is evidence of payments.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny the *Trustee's Motion to Dismiss for Failure to Deliver Tax Refunds*, Docket No. 25, filed by the Chapter 13 Trustee, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, I also certify that a copy of this motion was sent via US Mail to the Debtor, Juan Carlos Massa Velazquez, to his address of record: Urb Turabo Gardens A37 37 Street, Caguas PR 00727.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 4th day of January, 2023.

/s/**Roberto Figueroa Carrasquillo**
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USDC 203614
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MONEY ORDER
19-457331697
\$ 500.00
PAY EXACTLY FIVE HUNDRED DOLLARS AND NO CENTS
PAY TO THE ORDER OF Alejandro Oliveras trustee
Finco de Inversiones, S.A. de C.V.
Carretera a Toluca # 2000
San Mateo Atenco, Mexico
MONEY ORDER RECEIPT - NON NEGOTIABLE
18457331698
reintegró 2020

MONEY ORDER
19-457331703
\$ 132.00
PAY EXACTLY ONE HUNDRED THIRTY TWO DOLLARS AND NO CENTS
PAY TO THE ORDER OF Alejandro Oliveras trustee
Finco de Inversiones, S.A. de C.V.
Carretera a Toluca # 2000
San Mateo Atenco, Mexico
MONEY ORDER RECEIPT - NON NEGOTIABLE
18457331703
reintegró 2021

MONEY ORDER
19-457331700
\$ 500.00
PAY EXACTLY FIVE HUNDRED DOLLARS AND NO CENTS
PAY TO THE ORDER OF Alejandro Oliveras trustee
Finco de Inversiones, S.A. de C.V.
Carretera a Toluca # 2000
San Mateo Atenco, Mexico
MONEY ORDER RECEIPT - NON NEGOTIABLE
18457331700
reintegró 2020

MONEY ORDER
19-457331701
\$ 500.00
PAY EXACTLY FIVE HUNDRED DOLLARS AND NO CENTS
PAY TO THE ORDER OF Alejandro Oliveras trustee
Finco de Inversiones, S.A. de C.V.
Carretera a Toluca # 2000
San Mateo Atenco, Mexico
MONEY ORDER RECEIPT - NON NEGOTIABLE
18457331701
reintegró 2021

MONEY ORDER
19-457331704
\$ 73.00
PAY EXACTLY SEVENTY THREE DOLLARS AND NO CENTS
PAY TO THE ORDER OF Alejandro Oliveras trustee
Finco de Inversiones, S.A. de C.V.
Carretera a Toluca # 2000
San Mateo Atenco, Mexico
MONEY ORDER RECEIPT - NON NEGOTIABLE
18457331704
reintegró 2020

MONEY ORDER
19-457331702
\$ 500.00
PAY EXACTLY FIVE HUNDRED DOLLARS AND NO CENTS
PAY TO THE ORDER OF Alejandro Oliveras trustee
Finco de Inversiones, S.A. de C.V.
Carretera a Toluca # 2000
San Mateo Atenco, Mexico
MONEY ORDER RECEIPT - NON NEGOTIABLE
18457331702
reintegró 2021